

Eriksen, John

From: Eriksen, John
Sent: Thursday, February 17, 2000 4:42 PM
To: Krenicky, Jim
Subject: FW: Truth In Billing Requirements

Importance: High

FYI.

-----Original Message-----

From: Eriksen, John
Sent: Thursday, February 17, 2000 4:37 PM
To: 'tom.horn@aptissoftware.com'
Cc: 'ruth.candelario@aptissoftware.com'; 'tkrause@commsoft.net'; Thony, Roslyn; Visconti, Mike; Macko, JoEllen; Margaria, Jim
Subject: Truth In Billing Requirements
Importance: High

Tom, we have been informed of two additional requirements for the Truth In Billing Requirements. I will have mailed over night a set of these new requirements to you and Troy. These documents are from NECA and ILLUMINET and describe how charges from Service Providers sent by a clearinghouse or other "aggregator" should be handled. These requirements are described in Modules 002-B Sub CIC information and 020A New Service provider which were developed by The Ordering & Billing Forum as supplements to the standard 175 fixed character EMI record.

Several questions arise:

1. Have you received these modules and have they been incorporated in your planning and requirements document for Armstrong or any other customer. If so we need to confirm your approach. If not we need to discuss and agree on specifications.
2. In either case the modification cost of these two modules needs to be included in the requirements document and separately identified with in the total project cost.
3. In either case, once you review, we need to have a conference call shortly to confirm specifications. The deadline is quickly approaching and we need to test.
4. It appears that certain interfaces need to be modified to handle the expanded EMI record.

Please call so we can discuss.

Eriksen, John

From: Troy Krause [troy.krause@aptissoftware.com]
Sent: Friday, February 18, 2000 11:26 AM
To: 'jeriksen@agoc.com'
Subject: FW: Truth In Billing Requirements

FYI
Troy Krause
APTIS...a subsidiary of Billing Concepts
518-433-7694
troy.krause@aptissoftware.com

-----Original Message-----

From: Tom Horn
Sent: Friday, February 18, 2000 11:26 AM
To: Troy Krause
Subject: RE: Truth In Billing Requirements

Sorry I didn't get back yet. I'm working through some bill print issues right now.
I received an envelope on the 9th or 10th - Ruth has it now although she's out until Monday I believe.

-----Original Message-----

From: Troy Krause
Sent: Friday, February 18, 2000 11:19 AM
To: Tom Horn
Subject: FW: Truth In Billing Requirements

Tom,

Did you receive this information?

Troy Krause
APTIS...a subsidiary of Billing Concepts
518-433-7694
troy.krause@aptissoftware.com <mailto:troy.krause@aptissoftware.com>

-----Original Message-----

From: Eriksen, John [SMTP:jeriksen@agoc.com]
<mailto:[SMTP:jeriksen@agoc.com]> <mailto:[SMTP:jeriksen@agoc.com]>
<mailto:[SMTP:jeriksen@agoc.com]> >
Sent: Friday, February 18, 2000 11:04 AM
To: 'tkrause@commsoft.net'
Subject: Truth In Billing Requirements

Troy, I did not get a confirmation message on the e-mail I sent to Tom Horn on the additional TIB requirements. Did he get it and the over night package?

Eriksen, John

From: Eriksen, John
Sent: Tuesday, February 22, 2000 1:58 PM
To: 'Ruth Candelario'; Eriksen, John
Cc: Tom Horn; Hemanth Channaveerappa; Visconti, Mike; Thony, Roslyn
Subject: RE: Truth In Billing Requirements

Ruth, 3-4pm on WED. 23 would be best for us. Let me know.

-----Original Message-----

From: Ruth Candelario [SMTP:ruth.candelario@aptissoftware.com]
Sent: Monday, February 21, 2000 3:39 PM
To: 'Eriksen, John'
Cc: Tom Horn; Hemanth Channaveerappa
Subject: RE: Truth In Billing Requirements
Importance: High

Hi John,

Hope everything is going well.

We received the information about NECA and Illuminet, we now need to arrange for a conference call to discuss what exact changes your company would like to see in the bill print related with the TB. I would like to have that call for this Wednesday 23. Base on our schedules looks like Hemanth, Tom and I coincide in the following times:

9:30-10:30am

1:00-2:00pm

3:00-4:00pm

Please let me know what is the best time for you.

Thanks,

Ruth N. Candelario
Business Analyst - Interfaces Team
Aptis, A Subsidiary of Billing Concepts
(518) 431-7168

-----Original Message-----

From: Eriksen, John [SMTP:jeriksen@agoc.com]
Sent: Thursday, February 17, 2000 4:37 PM
To: 'tom.horn@aptissoftware.com'
Cc: 'ruth.candelario@aptissoftware.com'; 'tkrause@commsoft.net';
Thony, Roslyn; Visconti, Mike; Macko, JoEllen; Margaria, Jim
Subject: Truth In Billing Requirements
Importance: High

Tom, we have been informed of two additional requirements for the Truth In Billing Requirements. I will have mailed over night a set of these new requirements to you and Troy. These documents are from NECA and ILLUMINET and describe how charges from Service Providers sent by a clearinghouse or other "aggregator" should be handled. These requirements are described in Modules 002-B Sub CIC information and 020A New Service provider which were developed by The Ordering & Billing Forum as supplements to the standard 175 fixed character EMI record.

Several questions arise:

1. Have you received these modules and have they been incorporated in

your planning and requirements document for Armstrong or any other customer.

If so we need to confirm your approach. If not we need to discuss and agree on specifications.

2. In either case the modification cost of these two modules needs to

be included in the requirements document and separately identified with in

the total project cost.

3. In either case, once you review, we need to have a conference call

shortly to confirm specifications. The deadline is quickly approaching and

we need to test.

4. It appears that certain interfaces need to be modified to handle the

expanded EMI record.

Please call so we can discuss.

Eriksen, John

From: Eriksen, John
Sent: Monday, February 28, 2000 5:13 PM
To: Visconti, Mike
Subject: FW: Requirement document Truth in Billing

FYI.

-----Original Message-----

From: Eriksen, John
Sent: Monday, February 28, 2000 5:11 PM
To: 'Ruth Candelario'; Eriksen, John
Cc: Mike Visconti; Tom Horn; Hemanth Channaveerappa; Thony, Roslyn; Krenicky, Jim
Subject: RE: Requirement document Truth in Billing

Ruth, we are reviewing the requirements document and will get back to you by 2-29. I have sent by overnight mail a copy of the record layouts for the two modules we discussed on 2-24-00.

Our IT staff has modified our internal input interface into your EMR Hold File to accept a 360 character fixed length record or transmission from any of our input providers of data. This means that when we begin receiving the new modules 002-B and 020-A start around 3-15-00 they will automatically flow into the Comm Vergence System and begin processing. We are not sure how Comm Vergence will handle modules it has never received before. Our request is that APTIS check this out and let us know the system reaction so we can both plan accordingly. Whatever the plans are for these records you will need to save them for bill print testing. Please let me know when you receive the mail. Thanks.

-----Original Message-----

From: Ruth Candelario [SMTP:ruth.candelario@aptissoftware.com] <<mailto:SMTP:ruth.candelario@aptissoftware.com>>
Sent: Thursday, February 24, 2000 4:05 PM
To: John Eriksen
Cc: Mike Visconti; Tom Horn; Hemanth Channaveerappa
Subject: Requirement document Truth in Billing
Importance: High

Hi John,

Hope everything is fine.

This is the requirement document with the proposed changes to the bill print to comply with the Truth in Billing legislation. Please review this carefully and mark the items that need clarification or have to be change. We should receive this document signed by Tuesday, February 29 in order to start the modification on March 1st. Please contact me if you have any question about this document.

<<DWI21933 TB ASB.doc>>

Thanks,
Ruth N. Candelario
Business Analyst - Interfaces Team
Aptis, A Subsidiary of Billing Concepts
(518) 431-7168 << File: DWI21933 TB ASB.doc >>



March 8, 2000

Armstrong Group of Companies
Roslyn Thony
Vice-President, Billing Services Support
One Armstrong Place
Butler, PA 16001

San Antonio Office:
7411 John Smith Drive
Suite 200
San Antonio, TX 78229
P 210.949.7000
F 210.949.7100

Albany Office:
8 Southwoods Blvd
Albany, NY 12211
P 518.431.7500
F 518.427.1642

Glendale Office:
116 North Maryland Ave
Lower Level
Glendale, CA 91206
P 818.543.1881
F 818.543.1411

To all Aptis Clients

Software development at Aptis is in the process of developing our solution to satisfy the Truth in Billing requirements put out by the FCC. At this time we do not feel that we will be able to deliver that solution to all of our clients in time for the April 1 deadline. Therefore Aptis is strongly urging all of its clients to file for an extension with the FCC by March 15. We will contact you in the near future to go over our interpretation and implementation of the FCC requirements with you. If there are any immediate questions regarding this please feel free to contact me at 518-431-7561.

Sincerely,


Jim Lazur
Business Unit Director

Aptis, Inc.
A subsidiary of Billing Concepts
8 Southwoods Blvd.
Albany, New York 12211
March 15, 2000

Ms. Roslyn Thony
Vice-President Billing Support Services
Armstrong Group of Companies
One Armstrong Place
Butler, PA 16001

Dear Ms. Thony;

This letter is to inform you of Aptis' current state of preparedness in our CommVergence product with regard to the FCC Truth-in-Billing rules, which are to become effective April 1, 2000. Specifically, we are addressing the CommVergence product only as it relates to Armstrong Telephone Company.

Referencing a letter to Mr. Jim Margaria from Gregory D. Sloan dated March 1, 2000; Aptis has completed 1 of the 5 points of compliance itemized in that document. CommVergence will now:

- Produce a bill that "distinguishes between charges for which non-payment will result in disconnection of basic local service, and charges for which non-payment will not result in such disconnection"

Aptis will provide the above functionality to Armstrong, by April 1, 2000.

At this time, CommVergence does not:

- Clearly identify the name of the service provider associated with each charge
- Separate charges by service provider
- Provide "notification of any change in service provider, including notification that a new provider has begun providing service". A "new service provider" is "any provider that did not bill for services on the previous bill statement" and includes local exchange or interexchange carriers
- Provide "information that the customer may need to make inquiries about, or contest charges" and "display a toll-free number or numbers by which customers may inquire or dispute any charge contained on the bill"

Aptis will deliver these enhancements, as described in the Requirements document dated 3/14/00, within 90 days after written acceptance of the same by Armstrong.

I also want to give you a current status on CommVergence modifications relevant to compliance with processing of data from modules TIB020A and TIB002B.

Relating to processing for module TIB002B - Aptis' CommVergence has been programmed and successfully unit tested. The application will accept input data streams

from TIB002B and process without fault or exception. While data transmitted to CommVergence via this format will be processed and stored, it will not be printed on production generated bills at this time.

Related to processing for TIB020A – Aptis' CommVergence has also been programmed and successfully unit tested. The application will accept input data streams from TIB020A and process without fault or exception. However, data transmitted via this format will not be stored or available on output items.

Also related to TIB020A, it is the responsibility of Armstrong Telephone Company to work with Illuminet to get a clear and specific definition of the data contents of positions 009-020 (Local Company Use) of the sample record definition.

With regard to both of these modules, all unit testing was completed with Aptis generated input data. No sample data has been received from any other source for the purposes of system testing.

Please let me know if you have any questions regarding this information. Thank you.

Very truly yours;

Bob Rubbone
Service Unit Manager

cc: R. Thony – Armstrong
J. Eriksen – Armstrong
M. L. Visconti – Armstrong

Colorado Valley Telephone Cooperative, Inc.

Colorado Valley Telephone Cooperative, Inc.
Chronology of Discussions of Truth in Billing with Aptis

1. Email sent to Aptis employees Tracey London and Laura Nastasia dated July 14, 1999 briefly describing the requirements of TIB and requesting a response from Aptis.
2. Went over TIB requirements with Aptis employee Tracey London on August 5, 1999 while she was on-site assisting with our first billing.
3. Addressed TIB requirements, along with other issues, with several Aptis employees, including Karen Mitchell and Bob Warren, at the Aptis Users Group Meeting on August 12, 1999.
4. Requested update on TIB from Aptis employee Tracey London in an email dated September 16, 1999. Response from Aptis was that they were checking with Development on it. Later response indicated that Aptis was waiting for input from us as to the requirements. We again discussed our interpretation of the rules and suggested they combine that with input from their other customers to develop a solution.
5. In a letter written to Kelly Simmons, President of Billing Concepts (parent company of Aptis), dated October 6, 1999, included the need for assistance with the TIB requirements.
6. Held meeting at Colorado Valley with Billing Concepts employees Karen Mitchell and Sheila Joiner on December 7, 1999 to address issues including TIB.
7. On March 3, 2000, sent an email to Aptis employee Bob Kolar asking for the status of the TIB solution and reminding him of the April 1 deadline.
8. Received a letter from Aptis employee Bob Kolar dated March 9, 2000 stating that Aptis would not be able to deliver a solution by April 1, 2000.
9. In a phone conversation with Aptis employees Bob Kolar and Sean Conner on March 16, 2000, Bob stated that Aptis would need 90 days to have a solution in place.

This is an excerpt from an email sent to Aptis employees Tracey London and Laura Nastasia on July 14, 1999.

"Here's how we interpret the new Truth in Billing requirements.

As far as the requirement to separate charges by carrier, I'd like to denote that with just a heading line, not a page break. The heading might be set off by a line above and below the carrier name and number or by using a larger font to denote that information. In addition, I'd like new carriers to be highlighted in some color (yellow, pale green, whatever).

I think the rest of the requirements are pretty straight forward. Is there any way I can get a response back from Commsoft this morning?"

This is an excerpt from a list sent to Aptis employee Tracey London on September 16, 1999. The first paragraph is comments made from a Colorado Valley employee and the next two are comments from an Aptis employee.

1. The Truth in Billing has been delayed at least until 9-24-99, but it is something you guys still need to be working on. I have never received an estimate of how much it will cost to implement this.

Status: Following up with Development on this.

This is an excerpt from a letter sent to Aptis president Kelly Simmons on October 6, 1999 and copied to Parris Holmes, Jr., Chairman of Aptis, Karen Mitchell, Director of Implementation - Aptis, Melissa Frenyea, Director of Development – Aptis and John Wied, General Counsel for Colorado Valley.

“Truth in Billing requirements – no response from Aptis even though several requests have been made to get a cost estimate.”

cyndyz

From: Robert Kolar[SMTP:Robert.Kolar@aptissoftware.com]
Sent: Friday, March 03, 2000 4:18 PM
To: 'Cyndy Zoch'
Subject: RE: Truth in Billing

We have created the project specs and plan based on the most recent FCC guidelines. As I mentioned to you last week, we ask that you apply for an extension. While it is unlikely that we will need the extension in most cases, applying for the added time benefits everyone.

Our Business Analyst will be generating a specification for specific bill print requirements and passing them to you shortly.

I will have more for you early next week.

-----Original Message-----

From: Cyndy Zoch [SMTP:cyndyz@cvtv.net]
Sent: Friday, March 03, 2000 5:08 PM
To: 'robert.kolar@aptissoftware.com'
Subject: Truth in Billing

I haven't heard from you about the Truth in Billing requirements. I had asked what Aptis' position was going to be on this. This is a federal requirement that must be in place by April 1. I need to know ASAP what you are doing for your customers.

Cyndy



March 9, 2000

Colorado Valley Telephone Cooperative
Cyndy Zoch,
Director of Information Technology
4915 Highway 77 South
PO Box 130
LaGrange, TX 78945

To all Aptis Clients

Software development at Aptis is in the process of developing our solution to satisfy the Truth in Billing requirements put out by the FCC. At this time we do not feel that we will be able to deliver that solution to all of our clients in time for the April 1 deadline. Therefore Aptis is strongly urging all of its clients to file for an extension with the FCC by March 15. We will contact you in the near future to go over our interpretation and implementation of the FCC requirements with you. If there are any immediate questions regarding this please feel free to contact me at 518-431-7503.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Kolar", written over a horizontal line.

Robert Kolar
Business Unit Director

San Antonio Office:
7411 John Smith Drive
Suite 200
San Antonio, TX 78229
P 210.949.4700
F 210.949.7100

Albany Office:
8 Southwoods Blvd
Albany, NY 12211
P 518.431.7500
F 518.427.1642

Glendale Office:
116 North Maryland Ave
Lower Level
Glendale, CA 91206
P 818.543.1881
F 818.543.1411

Deerfield Farmers' Telephone Company

T. Holeman

From: Vicki Sutherland <VickiS@NIBINC.COM>
To: 'T. Holeman' <tholeman@cass.net>
Sent: Monday, November 15, 1999 1:05 PM
Subject: RE: Truth in Billing and other Miscellaneous Questions

See my responses below!

-----Original Message-----

From: T. Holeman [<mailto:tholeman@cass.net>]
Sent: Friday, October 29, 1999 12:24 PM
To: Vicki Sutherland
Subject: Truth in Billing and other Miscellaneous Questions

Hi Vicki!!

I've been going over the Truth in billing and FCC statement requirement sheets you passed out. These are very helpful, but I have a couple questions.

1. Clear notification of any change in the service provider.....A status page is a good idea.

"E" & "C" on the example bill is already being utilized , where would we put that info? We use the message line above the verbage for a

11/15/99

small monthly message to our customers. Michigan companies have the statement of "rate schedules for local exchange service rendered....." hard coded in this area.

My questions for this are: Since all companies have to comply, will we all share a cost in the assesment to see what it would cost to do the status page?

It sounds like we have to show PIC history, one way or another so some kind of time and cost would have to be done.

Can the undeniable & deniable charges verbage be on the status page also? .

2. Clear and Conspicuos Disclosure of Inquiry Cointacts. Are the carriers going to be supplying 800# for inquiries on their toll pages?

Currently we

bill & collect for Ameritech, GTE and AT&T and our local company number is on the toll pages.

The area on the bill "D" that you show in the example, we use it to say "payments received after such & such date will not show on this bill" and our inquiry and repair numbers are hardcoded with the above statement in item #1 above.

3. Once the Write 2K billing system is finished and we all convert, will there be more room to put this information on the bills instead of creating a status page or whatever?

A techline was sent out clarifying where NIB stands on the November Truth in Billing requirments. We are still in the process of assessing the changes that are required for April.

We will keep you posted.

I hope these questions make sense.

HAPPY HALLOWEEN!!!!!!

Thanks!

Teresa, DFTC
tholeman@cass.net <<mailto:tholeman@cass.net>>

TECHLINES



215 E. Hickory Street • P.O. Box 772 • Mankato, MN 56002-0772
Tel.: 507/625-1691 • Fax: 507/625-1057
www.nibinc.com

TECHLINES is a technical update for National Independent Billing Incorporated.
January 26, 2000

TRUTH IN BILLING REQUIREMENTS

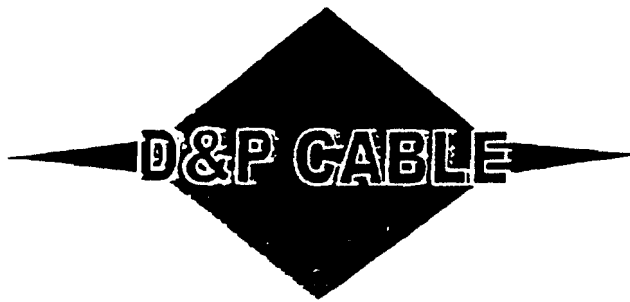
This Techline addresses the Federal Communications Commission (FCC) Guidelines for the Truth In Billing Order scheduled to be implemented April 1, 2000.

After researching the general requirements from the FCC regarding the rules changes, NIBI is of the opinion that it is not possible to fully interpret the FCC requirements because of their general specifications. The FCC has not yet created a compliance manual, which will provide the specific requirements for Truth in Billing. Until we receive that manual, NIBI has placed a hold on assessing any changes to NIBI EasyTel 2000 and Toll Billing systems related to the Truth in Billing requirements.

NIBI will not be responding to the NECA Truth in Billing Cost estimate (Dated October 27, 1999) or the Illuminet TCH B&C Truth in Billing survey (Dated November 15, 1999) until the FCC compliance manual is released.

If you have any questions, please contact:

Ken Klingsporn
NATIONAL INDEPENDENT BILLING, INC.
Business Support Manager
(507) 388-0230
kenk@nibinc.com



4200 Teal Road
P.O. Box 566
Petersburg, MI 49270

734-279-9000
Fax #: 734-279-2640

February 1, 2000

Ken Klingsporn
Business Support Manager
NIBI
215 E. Hickory St. P O Box 772
Mankato, MN 56002-0772

Dear Ken:

We received your January 26, 2000 "Techlines" newsletter regarding the Truth-in-Billing ("TIB") requirements of the Federal Communications Commission ("FCC"). In that newsletter, you indicated that NIBI "has placed a hold on assessing any changes to NIBI EasyTel 2000 and Toll Billing systems" related to the FCC's TIB requirements until the FCC issues a "compliance manual." You also indicated that NIBI will not be responding to various independent toll clearinghouses' inquiries and surveys, including those associated with time and cost requirements for TIB.

Prior to the receipt of NIBI's newsletter, Deerfield Farmers' Telephone Company believed the necessary billing system software required by us for TIB compliance was being developed by NIBI. Deerfield now seeks to assess what actions, if any, we may now need to take regarding our TIB compliance, including whether we will need to seek a further waiver from the FCC.

Accordingly, we request that NIBI respond to the following questions: (1) What "compliance manual" has the FCC agreed to issue?; (2) Which of the FCC's TIB rules will NIBI's software be unable to service by April 1, 2000?; (3) What effect did NIBI's failure to respond to the time and cost estimates from the various independent toll clearinghouses have on Deerfield's ability to recover any such costs?

Due to the April 1, 2000 deadline for full TIB compliance, we would appreciate your response in writing by February 11, 2000. Obviously, the quicker the response, the better able we will be to assess what steps are necessary.

Sincerely,

David LaRocca
President

cc: Scott Grill